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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

STEVE JOHNSON

Plaintiff,  
 v.

HILV FEE, LLC; NAV-115 E. TROPICANA,  
 LLC; LAS VEGAS METROPOLITAN POLICE  
 DEPARTMENT; LAS VEGAS  
 METROPOLITAN POLICE OFFICER A; LAS  
 VEGAS METROPOLITAN POLICE OFFICER B;  
 LAS VEGAS METROPOLITAN POLICE  
 OFFICER C; LAS VEGAS METROPOLITAN  
 POLICE OFFICER D; LAS VEGAS  
 METROPOLITAN POLICE OFFICER E; LAS  
 VEGAS METROPOLITAN POLICE OFFICER F;  
 LAS VEGAS METROPOLITAN POLICE  
 OFFICER G and DOES 9 to 50

Defendants.

Case No.: 2:18-cv-01381-RFB-BNW

**STIPULATION AND [ORDER] TO FILE  
 OUT OF TIME FOR PLAINTIFF’S  
 RESPONSE TO DEFENDANTS HILV FEE,  
 LLC AND NAV-115 E. TROPICANA LLC’S  
 MOTION FOR SUMMARY JUDGMENT [DE  
 115]**

**(FIRST REQUEST)**

Plaintiff, STEVE JOHNSON (“Johnson” or “Plaintiff”), by and through counsel Andrew Williams  
 of the law firm The Williams Group, and Defendants HILV Fee LLC and NAV-115 E. Tropicana, LLC  
 (“Defendants”) by and through counsel, Christopher A. Lund of the law firm Tyson & Mendes LLP  
 (collectively the “Parties”), hereby stipulate and agree as follows:

1 Defendants filed a Motion for Summary Judgment with various exhibits (the “MSJ”) on August  
2 14, 2020 [DE 115].

3 The parties entered into a stipulated agreement that extended the Plaintiff’s time to respond to the  
4 MSJ from September 4, 2020, to September 11, 2020. Unfortunately, shortly after the parties agreed to  
5 their stipulation, the undersigned had a death in his family. Due to the death and funeral that followed the  
6 parties entered into a second stipulated agreement that extended the Plaintiff’s time to respond to the MSJ  
7 from September 11, 2020, to September 18, 2020.

8 During the evening of September 18, 2020, the CM/ECF filing system and the undersigned could  
9 not access the CM/EFC filing system to review various docketed items or to file a response on behalf of  
10 the Plaintiff. *See* Exhibit “A”.

11 The undersigned informed counsel for the Defendants of the CM/ECF filing system’s technical  
12 issues and the parties agreed to allow Plaintiff to file his response on September 21, 2020. Due to the  
13 technical issues with the CM/ECF the parties could not file any stipulation on September 18, 2020. But  
14 for the CM/ECF filing system’s technical issues, the Plaintiff’s response would have been timely filed.

15 Subject to the approval of this Court, the Parties agree that Plaintiff shall have up to and including  
16 the 21<sup>st</sup> day of September 2020 to file a Response to the MSJ without penalty.

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1 The Parties respectfully submit that good cause exists for such extension, and that this request is  
2 not brought for any improper purpose or for purposes of delay.

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4 DATED this 21<sup>st</sup> day of September 2020.

DATED this 21<sup>st</sup> day of September 2020.

5 THE WILLIAMS LAW GROUP

TYSON & MENDES LLP

6  
7 *Andrew Williams*

/s/ Chris Lund

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13 *Attorneys for Plaintiff Steven Johnson*

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15 **IT IS SO ORDERED.**

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17 Dated this 22nd day of September 2020.

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UNITED STATES DISTRICT JUDGE